



File Code: 2820
Date: July 17, 2017

Dear Ms. Howard:

The Ashley National Forest appreciates this opportunity to comment on the December 2017 Vernal Oil and Gas Lease Sale Environmental Assessment, recently released by BLM for public comment. We offer the following comments for your consideration.

On page 5 of the EA, the first paragraph of Section 1.4.1 briefly describes a potential access issue for proposed lease parcels 22, 23, and 24. The EA says:

“Due to topography issues, access to these leases may need to be through the South Unit. Any surface disturbing activities on Forest Service lands that are associated with the leases would be subject to the Forest Service’s land use plan and would require prior approval from the Ashley National Forest.”

In other words, because of steep topography, the obvious way to access these lease parcels would be from adjacent lands managed by the Ashley National Forest. However, as shown on Figure 3-2 on page 39 of the EA, the portions of these parcels adjacent to National Forest are mapped as priority habitat (PHMA) for sage-grouse. Since lease areas within priority habitat would be stipulated by the BLM as no-surface occupancy (NSO), no roads could be constructed across the NSO areas to reach the adjacent National Forest lands. So, although lease access “may need to be through the South Unit,” the lease stipulations for priority sage-grouse habitat would likely preclude BLM from approving such access.

Even if BLM allowed road construction across portions of lease parcels mapped as priority habitat, and stipulated as NSO, there are additional sage-grouse and inventoried roadless issues on the adjacent Forest Service land.

As shown on Figure 3-2 on page 39 of the EA, Forest Service lands adjacent to lease parcels 22, 23, and 24 are mapped as Anthro Mountain sage-grouse habitat. Although the EA acknowledges that road access across the Forest “*would require prior approval from the Ashley National Forest,*” the EA fails to mention that such approval might be difficult to obtain. The 2015 USFS Greater Sage-Grouse ROD, applicable to Utah, mandated that Anthro Mountain sage-grouse habitat be stipulated as No Surface Occupancy (NSO) for new oil and gas leases (see page 152 of the USFS ROD). Although the Anthro Mountain sage-grouse habitat is technically outside of the actual lease parcels, it should probably be considered NSO for development of any new (post 2015) oil and gas leases immediately adjacent to that habitat.

Although there are existing Forest Service roads in close proximity to parcels 22, 23, and 24, some of those roads pass through Anthro Mountain sage-grouse habitat, pass close to several sage-grouse leks, or are within Forest Service inventoried roadless. These sage-grouse and inventoried roadless concerns would add restrictions or preclude upgrading or industrial use



(e.g., heavy truck traffic) of those existing roads (see pages 152-154 of the 2015 USFS Greater Sage-Grouse ROD, specifically GRSG-M-FML-ST-081-Standard).

We recommend that the adjacent Anthro Mountain sage-grouse habitat be acknowledged and stipulated as No Surface Occupancy for lease parcels 22, 23, and 24. We also recommend that the specialist checklist, on page 207 of the EA, be updated to acknowledge and include the Anthro Mountain sage-grouse habitat for parcels 22, 23, and 24.

On other topics, we note that a document called “Greater Uinta Basin Technical Support Document [BLM, 2012]” is cited on page 9 of the EA. However, that document is not described or included in the list of references cited on page 83.

We also note that in Section 5.1 of the EA, starting on page 80, the far-right column of the table is not fully visible or legible.

We also note a minor grammar issue in the EA. The first sentence of the second paragraph of Section 4.2, on page 46 of the EA, says: “*Lease notices are information notice that has no ...*”

If you have questions about this letter, or need additional information on the comments provided, please contact David Herron at our Duchesne office, at (435) 781-5218 or daherron@fs.fed.us.

Sincerely,

JEFF SCHRAMM
Forest Supervisor